

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DEMARCO MAX VAC CORP.,)	
)	
)	
Plaintiff,)	Civil Action No. 08-cv-77
)	Hon. Samuel Der-Yeghiayan
v.)	Mag. Judge Maria Valdez
NORTHWIND AIR SYSTEMS)	
(a Canadian Corporation) d/b/a DUROVAC)	
INDUSTRIAL VACUUMS, & JAN)	
OSTERMEIER INDUSTRIAL VACUUMS)	
SALES LLC (a Wisconsin Corporation),)	
)	
Defendants.)	
_____)	

AGREED MOTION FOR ENTRY OF PROTECTIVE ORDER

Defendants Northwind Air Systems, Jan Ostermeier, and Jan Ostermeier Industrial Vacuum Sales LLC (“Defendants”), as agreed to by Plaintiff Demarco Max Vac Corp., (collectively the “Parties”), by and through their attorneys, move this Court for entry of their proposed protective order. In support of this motion, the Parties state as follows:

1. This is a trademark case involving one plaintiff and three defendants, all of whom have been and/or currently are competitors.

2. Due to the nature of this litigation, the parties recognize that discovery will involve production of confidential information and documents subject to protection under Fed. R. Civ. P. 26(c), which if disclosed to certain parties would result in injury to one or more of the parties.

3. The parties have reviewed Fed.R.Civ.P. 26(c), L.R. 26.2, and Judge Der-Yeghiayan’s Case Management Procedures as published on the Court’s website, and have negotiated a protective order that is narrowly and carefully tailored to address their mutual

concerns relating to the disclosure of confidential information, the ability to conduct appropriate discovery, and the legitimate public interest. A copy of the proposed protective order is attached hereto as Exhibit 1.

Dated June 16, 2008

Respectfully submitted,

DEFENDANTS

By: /s/Jeana R. Lervick
One of its Attorneys

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